

## **Privacy Statement**

This privacy statement explains how personal information is collected and used at Modum Bad. "Privacy is the right to a private life and the right to control one's personal information. The term implies an individual's right to influence the use and dissemination of personal information about themselves." This privacy statement provides information on how we collect and use personal information and what rights you have when your personal information is registered with us.

### What principles underlie the collection of personal information?

In accordance with the European Convention on Human Rights, Article 8, and the Constitution § 102, everyone has the right to respect for their private life. Based on this, specific and detailed regulations have been developed to safeguard privacy, particularly the new Personal Data Act of 20.07.2018 and the EU General Data Protection Regulation (GDPR). Which laws and regulations apply to Modum Bad when processing personal information? The most central laws ensuring the processing of personal information include:

- Working Environment Act
- Archives Act
- Public Administration Act
- EU General Data Protection Regulation (GDPR)
- Health Research Act
- Health Personnel Act
- Health Register Act
- Public Access to Information Act
- Patient Rights Act
- Patient Records Act
- Personal Data Act

### What personal information does Modum Bad collect?

Health information:

We are obligated to keep a journal, which will contain sensitive personal information as it includes health information. Information in your patient journal may be collected in various ways:

- Through your conversations with healthcare professionals
- Through treatment and/or follow-up
- From others you have previously visited, such as a general practitioner or another public or private hospital. In general, such collection requires your consent.

Research and quality assurance:

Personal information can also be used for research or quality assurance. If used for purposes other than treatment, your consent is generally required.

Personal information:

Modum Bad processes necessary personal information about our employees to fulfill our role as an employer, including administering salaries and exercising personnel responsibilities. The purpose of storing this information includes maintaining an overview of the employment relationship to ensure correct payment and communicate with other public authorities and registries.

### How does Modum Bad process personal information?

Modum Bad can only process relevant personal information within the purposes of the specific processing of personal information. The processing must also be proportionate, meaning we can only store the personal information that is necessary. When you are a patient with us, we process information about who you are (e.g., name and national ID number) and your contact information (address, phone number, email). Additionally, we process sensitive personal information related to your health. All information is stored in Modum Bad's secure data systems. As an employee, we process several of your personal information, such as name, national ID number, bank account number, union affiliation, CV, course participation, further education, and more. The information is stored in separate secure data systems.

### How does Modum Bad safeguard personal information?

The storage of personal information is usually based on law, regulation, or consent. Modum Bad maintains an overview of the processing of personal information we have and the different databases where personal information is stored. Access to the databases is access- and needs-controlled and described in separate procedures.

### Access to personal information

Modum Bad has procedures for access control and who has access to what and to which personal information. All employees are subject to confidentiality, either based on the law because they are healthcare professionals or based on the employment contract. Our main rule is that one can only have access to information needed to perform their job.

### Disclosure of personal information

Modum Bad cannot disclose your personal information without your consent. Data processors, sub-processors, suppliers, collaborators, and audit authorities may sometimes have access to personal information. To ensure privacy in such cases, there must always be either a formal data processing agreement or the party involved is subject to strict confidentiality.

### What rights do you have as a registered person at Modum Bad?

Modum Bad follows guidelines developed by the Norwegian Data Protection Authority regarding your rights as a registered person with us.

- Right to access your patient journal
- Right to access the log
- Request for blocking journal information
- Correction of journal information
- Right to complain to the Norwegian Data Protection Authority

### How to complain to the Norwegian Data Protection Authority?

Contact our Data Protection Officer at Modum Bad for advice and guidance on your rights and questions about privacy and the handling of your information. The Data Protection Officer has confidentiality if you wish to report something in confidence.

Terje Grendal

Data Protection Officer [Terje.grendal@modum-bad.no](mailto:Terje.grendal@modum-bad.no) Phone: 32 74 97 92

About the Data Protection Officer and the tasks assigned to the Data Protection Officer, see the Norwegian Data Protection Authority's website (<https://www.datatilsynet.no/rettigheter-og-plikter/virksomhetenes-plikter/personvernombud/personvernombudets-oppgaver>)